

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Cole Hardwood, Inc.  
1611 W. Market St.  
Logansport, IN 46947**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T017-7522-00028	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:  Expiration Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary rough sawing of green and kiln dried lumber operation.

Responsible Official: Milton Cole  
Source Address: 1611 W. Market St., Logansport, IN 46947  
Mailing Address: P.O. Box 568 Logansport, IN 46947  
Phone Number: 219-753-3151  
SIC Code: 5030, 2430  
County Location: Cass  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) wood fired boiler, identified as EU01-1, with a maximum heat input rate of 10.0 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S1.
- (b) One (1) wood fired boiler, identified as EU01-2, with a maximum heat input rate of 18.4 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S2.
- (c) One (1) wood fired boiler, identified as EU01-3, with a maximum heat input rate of 20.1 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S3.
- (d) One (1) diesel fired boiler, used as a backup boiler, with a maximum heat input rate of 4.2 MMBtu/hr.
- (e) One (1) woodworking machining line - consisting of an I.D.I. rip saw, a planer and a sander - identified as EU02-1, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, material machined is wood, having a baghouse for control, exhausting at one stack, identified as DC1.
- (f) One (1) woodworking machining line - consisting of a rip saw - identified as EU02-2, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, material machined is wood, having a baghouse for control, exhausting at one stack, identified as DC2.
- (g) One (1) low-pressure airless spray gun, identified as EU03-1, coating wood board ends, with a maximum capacity of 4,000 board feet (16,800 pounds) per hour.

- (h) One (1) low-pressure airless spray gun, identified as EU03-2, coating wood board ends, with a maximum capacity of 16,000 board feet (92,800 pounds) per hour .

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3-2(c))

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish

record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document



is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM,. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a

determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after

IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC

13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this

existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM,, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326

IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (A) A brief description of the change within the source;
  - (B) The date on which the change will occur;



- (C) Any change in emissions; and
- (D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## Testing Requirements [326 IAC 2-7-6(1)]

### C.9 Performance Testing [326 IAC 3-6]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.10 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

### C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.13 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3].

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
  - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

- 
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize



excess emissions from the affected facility while the corrective actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

##### **C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum

of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other

means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

One (1) wood fired boiler, identified as EU01-1, with a maximum heat input rate of 10.0 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S1.

One (1) wood fired boiler, identified as EU01-2, with a maximum heat input rate of 18.4 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S2.

One (1) wood fired boiler, identified as EU01-3, with a maximum heat input rate of 20.1 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S3.

One (1) diesel fired boiler, used as a backup boiler, with a maximum heat input rate of 4.2 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4, emissions from the wood fired boiler, identified as EU01-1, shall be limited to 0.60 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4, emissions from the wood fired boiler, identified as EU01-2, shall be limited to 0.44 pounds per MMBtu heat input.
- (c) Pursuant to 326 IAC 6-2-4, emissions from the wood fired boiler, identified as EU01-3, shall be limited to 0.39 pounds per MMBtu heat input.
- (d) Pursuant to 326 IAC 6-2-4, emissions from the diesel fired boiler shall be limited to 0.55 pounds per MMBtu heat input.

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

During the period between 60 and 180 days after issuance of this permit, the Permittee shall perform PM testing on the wood fired boilers, identified as EU01-2 and EU01-3, to demonstrate compliance with D.1.1(b) and D.1.1(c) utilizing a method as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing

#### D.1.3 Particulate Matter (PM)

The multi-cyclone for PM control shall be in operation and shall control emissions from the boilers, identified as EU01-1, EU01-2 and EU01-3, at all times that the boilers are in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.4 Visible Emissions Notations

---

- (a) Visible emission notations of the boilers', identified as EU01-1, EU01-2 and EU01-3, stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.5 Multi-cyclone Inspections

---

An inspection shall be performed each calendar quarter of all multi-cyclones controlling the boilers when venting to the atmosphere. A multi-cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### D.1.6 Multi-cyclone Failure

---

In the event that multi-cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.7 New Source Performance Standard (NSPS) [40CFR Part 60.40c ,40CFR Part 60.48c(g), 326 IAC 12 and 326 IAC 2-7-5(3)(B)]

---

Pursuant to 40 CFR Part 60.48c(g) (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and 326 IAC 12 (New Source Performance Standards), the permittee shall maintain a daily record of the amount of fuel combusted for the boilers, identified as EU01-2 and EU01-3. Pursuant to 326 IAC 2-7-5(3)(B), all records shall be maintained for a period of five (5) years following the date of such record.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

One (1) woodworking machining line - consisting of an I.D.I. rip saw, a planer and a sander - identified as EU02-1, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, material machined is wood, having a baghouse for control, exhausting at one stack, identified as DC1.

One (1) woodworking machining line - consisting of a rip saw - identified as EU02-2, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, material machined is wood, having a baghouse for control, exhausting at one stack, identified as DC2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), PM emissions from the woodworking machining line, identified as EU02-1, shall not exceed 17.2 pounds per hour when operating at a process weight rate of 8.4 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3 (Process Operations), PM emissions from the woodworking machining line, identified as EU02-2, shall not exceed 43.9 pounds per hour when operating at a process weight rate of 46.4 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

**D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

---

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.2.4 Particulate Matter (PM)**

---

The baghouses for PM control shall be in operation at all times when the respective woodworking machining lines, identified as EU02-1 and EU02-2, are in operation.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.2.5 Visible Emissions Notations**

---

- (a) Daily visible emission notations of the woodworking machining lines, identified as EU02-1 and EU02-2, stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

**D.2.6 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1 and 3 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

**D.2.7 Broken or Failed Bag Detection**

---

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have

been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking machining lines' stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - Inlet and outlet differential static pressure
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.



## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

One (1) low-pressure airless spray gun, identified as EU03-1, coating wood board ends, with a maximum capacity of 4,000 board feet (16,800 pounds) per hour.

One (1) low-pressure airless spray gun, identified as EU03-2, coating wood board ends, with a maximum capacity of 16,000 board feet (92,800 pounds) per hour .

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

## Compliance Determination Requirements

**D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

---

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

No monitoring is applicable to the airless spray guns.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Cole Hardwood, Inc.  
Source Address: 1611 West Market St., Logansport, IN 46947  
Mailing Address: P.O. Box 568, Logansport, IN 46947  
Part 70 Permit No.: 017-7522-00028

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Cole Hardwood, Inc.  
Source Address: 1611 W. Market St., Logansport, IN 46947  
Mailing Address: PO Box 568, Logansport, IN 46947  
Part 70 Permit No.: T017-7522-00028

**This form consists of 2 pages**

**Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)	
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice by mail or facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT**

## COMPLIANCE DATA SECTION

### PART 70 OPERATING PERMIT QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Cole Hardwood, Inc.  
Source Address: 1611 W. Market St., Logansport, IN 46947  
Mailing Address: PO Box 568, Logansport, IN 46947  
Part 70 Permit No.: T017-7522-00028

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Part 70 Operating Permit**

#### **Source Background and Description**

**Source Name:** Cole Hardwood, Inc.  
**Source Location:** 1611 W. Market, Logansport, IN 46947  
**County:** Cass  
**SIC Code:** 5030, 2430  
**Operation Permit No.:** T017-7522-00028  
**Permit Reviewer:** Mike Swinney

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Cole Hardwood, Inc. relating to the operation of the rough sawing of green and kiln dried lumber.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) wood fired boiler, identified as EU01-2, with a maximum heat input rate of 18.4 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S2.
- (b) One (1) wood fired boiler, identified as EU01-3, with a maximum heat input rate of 20.1 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S3.
- (c) One (1) diesel fired boiler, used as a backup boiler, with a maximum heat input rate of 4.2 MMBtu/hr.
- (d) One (1) woodworking machining line - consisting of an I.D.I. rip saw, a planer and a sander - identified as EU02-1, with a maximum input capacity of 4,000 board feet (16,800 pounds) per hour, material machined is wood, having a baghouse for control, exhausting at one stack, identified as DC1.
- (e) One (1) woodworking machining line - consisting of a rip saw - identified as EU02-2, with a maximum input capacity of 16,000 board feet (92,800 pounds) per hour, material machined is wood, having a baghouse for control, exhausting at one stack, identified as DC2.
- (f) One (1) low-pressure airless spray gun, identified as EU03-1, coating wood board ends, with a maximum capacity of 4,000 board feet (16,800 pounds) per hour.
- (g) One (1) low-pressure airless spray gun, identified as EU03-2, coating wood board ends, with a maximum capacity of 16,000 board feet (92,800 pounds) per hour .



## Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) One (1) wood fired boiler, identified as EU01-1, with a maximum heat input rate of 10.0 MMBtu/hr, using multi-cyclones as control, and exhausting at one stack, identified as S1.

## Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations
- (b) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (c) Woodworking operations, consisting of sawing, sanding and grinding, with emissions of .98 lbs/hr PM10

## Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 017-1933-00028, issued on April 15, 1991 and
- (b) CP 017-5418-00028, issued on August 28, 1996.

No previous permits were needed for the other facilities listed under *Permitted Emission Units and Pollution Control Equipment* and *Insignificant Activities*.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP 017-1933-00028, issued on April 15, 1991;

Condition 4:

That particulate matter emissions from 23.9 MMBtu wood -fired boiler shall comply with 4-2 (Incinerator) limit of 0.3 pounds of particulate matter per 1000 pounds of dry exhaust gas at standard conditions corrected to 50% excess air.

Reason not incorporated:

326 IAC 4-2-2 (Incinerator Requirements)

Based on an Indiana Air Pollution Control Board ruling on October, 1992, the wood-fired boiler, identified as EU01-2 in the Part 70 permit, shall not be considered an incinerator and therefore it is not subject to 326 IAC 4-2-2.

- (b) CP 017-1933-00028, issued on April 15, 1991;

Condition 5:

That particulate matter emissions from the wood waste fuel handling system shall be limited to 8.17 pounds per hour.

Reason not incorporated:

Updated information was received from the source that shows a higher maximum input for this facility, identified as EU03-2 in the Part 70 permit. The limit will now be 43.9 pounds per hour when operating at a process weight rate of 46.4 tons per hour. According to state rule regulations, this facility is exempt from state permitting because the emissions are less than 5 tons per year.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of the review was received on December 12, 1996.

A notice of completeness letter was mailed to the source on January 13, 1997.

### Emission Calculations

See Appendices A, B, C, D, E and F of this document for detailed emissions calculations

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	4498
PM-10	4486
SO <sub>2</sub>	6
VOC	24
CO	107

NO <sub>x</sub>	45
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Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Phenols	less than 10
Acrolein	less than 10
Formaldehyde	less than 10
Acetaldehyde	less than 10
Benzene	less than 10
Napthalene	less than 10
Cobalt	less than 10
Arsenic	less than 10
Cadmium	less than 10
Chromium	less than 10
Manganese	less than 10
Mercury	less than 10
Nickel	less than 10
Selenium	less than 10
TOTAL	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	5.6
PM-10	5.6
SO <sub>2</sub>	0.4
VOC	1.7
CO	11.6
NO <sub>x</sub>	4.8
HAP	less than 10

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits and controls, of the significant emission units.

Process/ Facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
EU01-1 *	3.9 *	3.4 *	1.1	4.1	21.9	8.8	0.1
EU01-2 *	7.2 *	6.3 *	1.9	7.5	40.3	16.1	0.2
EU01-3 *	7.9 *	6.9 *	2.1	8.2	44.0	17.6	0.2
Diesel ** fired boiler	0.3	0.3	0.9		0.7	2.6	
EU02-1 **	0.2 *	0.2 *					
EU02-2 **	4.4 *	4.4 *					
EU03-1 **				3.9			
EU03-2 **	4.2	4.2					
Total	28.2	25.7	6.0	23.7	106.9	45.1	0.5

\* These are based on estimated control efficiencies. The requirement to operate the control equipment is federally enforceable.

\*\* For the purposes of this table, PM10 is assumed equal to PM

### County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed sources under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Federal Rule Applicability

40 CFR 60.40.c, 40 CFR Part 60.48c(g), 326 IAC 12 and 326 IAC 2-7-5(3)(B) (New Source Performance Standard)

- (a) The wood fired boilers, identified EU01-2, and EU01-3, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c) because construction was commenced after the applicable date of June 9, 1989 and the maximum design heat input capacity for each boiler is between 10 and 100 MMBtu/hr.

Pursuant to 40 CFR Part 60.48c(g) (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and 326 IAC 12 (New Source Performance Standards), the permittee shall maintain a daily record of the amount of fuel combusted for the boilers, identified as EU01-2 and EU01-3. Pursuant to 326 IAC 2-7-5(3)(B), all records shall be maintained for a period of five (5) years following the date of such record.

The wood-fired boilers, identified as EU01-2 and EU01-3, are not subject to 40 CFR 60.43c (Standard for Particulate Matter) and 40 CFR 60.45c (Compliance and Performance Test Methods and Procedures for Particulate Matter) because each boiler has a maximum design heat capacity of less than 30MMBtu/hr.

The wood-fired boilers, identified as EU01-2 and EU01-3, are not subject to 40 CFR 60.42c (Standard for Sulfur Dioxide) and 40 CFR 60.44c (Compliance and Performance Test Methods and Procedures for Sulfur Dioxide) because there are no sulfur dioxide standards for wood-fired boilers.

- (b) The wood fired boiler, identified EU01-1, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40a). The boiler was constructed in 1983 (which is after the applicable date of September 18, 1978) but is not subject the NSPS rule because the heat input rate for the boiler is 10. MMBtu/hr, which is less than the applicable heat input rate of 250 MMBtu/hr.
- (c) The diesel fired boiler is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c). The boiler was constructed in 1990 (which is after the applicable date of June 9, 1989) but is not subject the NSPS rule because the heat input rate for the boiler is 4.2 MMBtu/hr, which is less than the applicable heat input rate of 10 MMBtu/hr.

326 IAC 14 and 40 CFR Subpart 63 (National Emission Standards for Hazardous Air Pollutants (NESHAPs))

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Subpart 63) applicable to this source.

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major stationary source because emissions after controls of no regulated pollutants are equal to or greater than 250 tons per year and it is not one of the twenty-eight (28) listed sources under 326 IAC 2-2 therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit more than one hundred (100) tons per year of PM-10 and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

Wood fired boilers, identified as EU01-1, EU01-2 and EU01-3, and diesel fired boiler

**326 IAC 6-2-4 (Particulate Matter Limitation (PM))**

- (a) Pursuant to 326 IAC 6-2-4, emissions from the wood fired boiler, identified as EU01-1, shall be limited to 0.60 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4, emissions from the wood fired boiler, identified as EU01-2, shall be limited to 0.44 pounds per MMBtu heat input.
- (c) Pursuant to 326 IAC 6-2-4, emissions from the wood fired boiler, identified as EU01-3, shall be limited to 0.39 pounds per MMBtu heat input.
- (d) Pursuant to 326 IAC 6-2-4, emissions from the diesel fired boiler shall be limited to 0.55 pounds per MMBtu heat input.

**Particulate Matter (PM)**

The multi-cyclone for PM control shall be in operation and shall control emissions from the boilers, identified as EU01-1, EU01-2 and EU01-3, at all times that the boilers are in operation.

**Preventive Maintenance Plan**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is not required for the boilers, identified as EU01-1, EU01-2 and EU01-3, because the boilers have a control device and the allowable emissions do not exceed 10 lb/hr.

Woodworking machining lines, identified as EU02-1 and EU02-2

**326 IAC 6-3 (Particulate Matter (PM))**

- (a) Pursuant to 326 IAC 6-3 (Process Operations), PM emissions from the woodworking machining line, identified as EU02-1, shall not exceed 17.2

pounds per hour when operating at a process weight rate of 8.4 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3 (Process Operations), PM emissions from the woodworking machining line, identified as EU02-2, shall not exceed 43.9 pounds per hour when operating at a process weight rate of 46.4 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the woodworking machining lines, identified as EU02-1 and EU02-2, are in operation.

#### 326 IAC 2-7-5(13) (Preventive Maintenance Plan)

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these woodworking lines because the units have a control device and emission limits exceed 10 lbs/hr.

#### Low-pressure airless spray guns, identified as EU03-1 and EU03-2

#### 326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 6-3-2 (Particulate Matter (PM))

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 2-7-5(13) (Preventive Maintenance Plan)

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is not required for these facilities because the actual emissions are less than 25 tons per year.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Wood fired boilers, identified as EU01-1, EU01-2, and EU01-3

Visible Emissions Notations

- (a) Visible emission notations of the boilers', identified as EU01-1, EU01-2 and EU01-3, stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.



- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### Multi-cyclone Inspections

An inspection shall be performed each calendar quarter of all multi-cyclones controlling the woodworking operation when venting to the atmosphere. A multi-cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### Multi-cyclone Failure

In the event that multi-cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### Woodworking machining lines, identified as EU02-1 and EU02-2

##### Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking machining lines', identified as EU02-1 and EU02-2, stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

##### Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

These monitoring conditions are necessary because the baghouses for the woodworking lines must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

#### Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

#### Conclusion

The operation of the rough sawing of green and kiln dried lumber shall be subject to the conditions of the attached proposed Part 70 Permit No. T017-7522-00028.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for Part 70 Operating Permit

**Source Name:** Cole Hardwood, Inc.  
**Source Location:** 1611 W. Market St., Logansport, IN 46947  
**County:** Cass  
**SIC Code:** 5030, 2430  
**Operation Permit No.:** T017-7522-00028  
**Permit Reviewer:** Mike Swinney

On August 25, 2000 the Office of Air Management (OAM) had a notice published in the Pharos Tribune, Logansport,, Indiana, stating that Cole Hardwood, Inc. had applied for a Part 70 Operating Permit to operate a rough sawing of green and kiln dried lumber operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes to the final Part 70 permit.

#### Revision 1:

The expiration has been added to the signature box on the first page. The expiration is exactly 5 years after the issuance date.

Operation Permit No.: T017-7522-00028	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:  <b>Expiration Date:</b>

#### Revision 2:

B.1 (Permit No Defense) has been deleted. This is not in IC13, but we do have the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to B.14, now B.13 (Permit Shield), which provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance.

~~B.1 Permit No Defense [IC 13]~~

~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit,~~

~~are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7-7.~~

~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

### Revision 3:

B.13, now B.12, (Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to B.13(b)(5). The emergency form is for emergencies only , and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence has been deleted. Since we know it is a TV source, then we also know the malfunction rule has been superseded by the emergency rule. Paragraph (f) "compliance" has been changed to "accordance".

#### ~~B.13~~ **B.12** Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** notice, either ~~in writing by mail~~ or facsimile, ~~of the emergency~~ to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14, now B.13, (Permit Shield). Some of the language from what was previously in B.1 has been added to (a). Some of the language has been removed from (c) because it is unnecessary and would be contradictory to our revising operating permits. Construction permit terms are covered in the definition of applicable requirements.

**B.14 B.13** Permit Shield [326 IAC 2-7-15] **[326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit~~, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

**Revision 5:**

B.16, now B.15 (Deviations from Permit Requirements and Conditions). The OAM is no longer requiring sources to report deviations in 10 days. Now they will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since we relaxed the 10 day notification to a quarterly report.

**B.16 B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation~~ **using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent.**  
~~except for the failure to perform the monitoring or record the information required by the~~

~~compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~ **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

**The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
  - ~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) ~~Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~  
**Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**
- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

#### Revision 6:

B.19, now B.18 (Permit Amendment or Modification). 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore this condition has been revised to clarify that. EPA has also requested this change.

- ~~B.19~~ **B.18** Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
  - (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~

- (c) The Permittee may implement administrative amendment changes addressed in the

request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-7-11(c)(3)]

#### Revision 7:

B.24, now B.23 (Transfer of Ownership or Operational Control). 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore this condition has been revised to clarify that. EPA has also requested this change.

**B.24 B.23** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Revision 8:

C.20 (General Reporting Requirements). The Semi-Annual Compliance Monitoring Report is now the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed, all the information is in B.13, now B.12. In (d) we have clarified that the report does need to be certified by the responsible official, this change is also reflected in all the D sections. EPA has also requested this change.

**C.20** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit **a the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent.** Any deviation from ~~the permit~~ requirements, ~~and~~, the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission



required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~———— (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~———— (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

- ~~(g)~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

#### **Revision 9:**

The OAM has revised the reporting forms as shown on the following pages to conform with the previous revisions.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION BRANCH**

**P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/~~DEVIATION~~ OCCURRENCE REPORT**

Source Name: Cole Hardwood, Inc.  
Source Address: 1611 W. Market St., Logansport, IN 46947  
Mailing Address: PO Box 568, Logansport, IN 46947  
Part 70 Permit No.: T017-7522-00028

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No. 2	
9 4. —	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing by mail or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. —	This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/ <del>Deviation</del> :
Describe the cause of the Emergency/ <del>Deviation</del> :

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/ <del>Deviation</del> started:
Date/Time Emergency/ <del>Deviation</del> was corrected:
Was the facility being properly operated at the time of the emergency/ <del>deviation</del> ?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/ <del>deviation</del> :
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT**

## COMPLIANCE DATA SECTION

### PART 70 OPERATING PERMIT ~~SEMI-ANNUAL~~ QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Cole Hardwood, Inc.  
Source Address: 1611 W. Market St., Logansport, IN 46947  
Mailing Address: PO Box 568, Logansport, IN 46947  
Part 70 Permit No.: T017-7522-00028

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the ~~compliance monitoring~~ requirements, and the date(s) of each deviation, the **probable cause of the deviation, and the response steps taken** must be reported. **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.** Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report.~~ If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Compliance Monitoring Permit Requirement** (specify permit condition #)

Date of each Deviation:

Duration of Deviation:

Number of Deviations:

*Probable Cause of Deviation:*

*Response Steps Taken:*

**Compliance Monitoring Permit Requirement** (specify permit condition #)

Date of each Deviation:

Duration of Deviation:

Number of Deviations:

*Probable Cause of Deviation:*

*Response Steps Taken:*

<b>Compliance Monitoring Permit Requirement</b> (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Compliance Monitoring Permit Requirement</b> (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Compliance Monitoring Permit Requirement</b> (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Appendix A

### Calculations

#### Conversion to MMBtu

Pursuant to 326 IAC 6-2-4 the emission limitation for those indirect heating facilities which were existing and in operation on or after September 21, 1983, shall be calculated using equation contained in subsection (a) of this section.

The horsepower (hp) provided in the Title V application did not correlate with the Btu/hr which was also provided. The OAM recalculated the conversion from horsepower to Btu/hr and corrected the errors. The strike out numbers are the incorrect MMBtu/hr heat cap and the bold numbers are the corrected MMBtu/hr.

The following is the formula used for converting hp to MMBtu/hr:

Horsepower (hp) provided by the company  
3.3446x10<sup>4</sup> Btu/hr conversion factor provided in AP-42 9/85 (reformatted 1/95) Appendix A  
**Equation:**  
(hp) \* (3.3446x10<sup>4</sup> Btu/hr) \* 1/1000000 = MMBtu/hr

Boiler	Year Installed	Horsepower	Heat input capacity MMBtu/hr
Boiler EU01-1	1983	300	<del>14.4</del> <b>10.0</b>
Diesel fired boiler	1990	125	<del>0.32</del> <b>4.2</b>
Boiler EU01-2	1991	550	<del>24</del> <b>18.4</b>
Boiler EU01-3	1996	600	<del>28.7</del> <b>20.1</b>

## Appendix A

### Calculations

#### PM Emission Limits

The following shows the emission limits on PM for the boilers.

**Equation** - from 326 IAC 6-2-4

$$Pt = \frac{1.09}{Q^{0.26}} \text{ where}$$

Pt = Pounds of particulate matter per million Btu (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in MMBtu heat input

Boiler	Year Installed	Heat Input Capacity of Boiler (MMBtu)	Heat Input Capacity of Source (MMBtu)	Emission Limit Pt (lb/MMBtu)	Emission Limit (tons/year)
Boiler EU01-1	1983	10.0	10.0	0.60	26.3
Diesel fired boiler	1990	4.2	14.2	0.55	10.1
Boiler EU01-2	1991	18.4	32.6	0.44	35.5
Boiler EU01-3	1996	20.1	52.7	0.39	34.3

## Appendix C

### Compliance

#### Compliance - Boilers

Boiler	Potential PM emissions before control tons/yr (from App. B)	Potential PM emissions after control tons/yr (from App. B)	PM emission limits tons/yr (from App. A)	Compliance with 326 IAC 6- 2-4
Boiler EU01-1	19.5	3.9	26.3	yes
Diesel fired boiler	0.26 (no control)	0.26 (no control)	10.1	yes
Boiler EU01-2	35.9	7.2	35.5	yes
Boiler EU01-3	39.3	7.9	34.3	yes



## Appendix D

### Calculations

#### Woodworking Machining Line EU02-1

##### **Emissions limit from 326 IAC 6-3**

Raw Lumber line consisting of a rip saw, plane, and sand, hogger  
Raw material = is 16,800 lbs/hr = 8.4 tons/hr

$$P = 4.10(8.4)^{0.67}$$

$$P = 4.10(4.2)$$

$$P = 17.2 \text{ lb/hr} = 412.8 \text{ lbs/day} = 75.3 \text{ tons/yr}$$

##### **Potential PM emissions before control**

Based on the company's analysis:

$$35.3 \text{ lbs PM generated} / 8 \text{ hr shift} = 4.4 \text{ lbs PM generated /hr} = 19 \text{ tons/yr}$$

##### **Potential PM emissions after control**

$$4.4 \text{ lbs/hr} * ((100-99)/100) = 0.044 \text{ lb/hr} = .2 \text{ tons/yr}$$

##### **Compliance**

Allowable emissions      vs      After control emissions

17.2 lbs of PM/hr                      0.044 lb of PM/hr                      in compliance with 326 IAC 6-3

## Appendix D

### Calculations

#### Woodworking Machining Line EU02-2

##### **Emissions limit from 326 IAC 6-3**

Green Lumber line consisting of a rip saw  
Raw material = is 92,800 lbs/hr = 46.4 tons/hr

$$P = 55.0(46.4)^{0.11} - 40$$

$$P = 55.0 (1.5) - 40$$

$$P = 42.5 \text{ lbs/hr} = 1020.0 \text{ lbs/day} = 186.1 \text{ tons/yr}$$

##### **Baghouse**

Grain loading per actual cubic foot of outlet air = 0.003  
Collection efficiency = 99.9%  
Total filter area = 3086  
Air to cloth ratio = 12.77  
7000 = 1 lb

##### **Potential PM emissions after control**

$$PM = (\text{gr/ft}^3) (\text{ft}^2) ((\text{ft}^3/\text{min}) / \text{ft}^2) = \text{gr/min}$$

$$PM (0.003\text{gr/ft}^3) (3086\text{ft}^2) ((12.77\text{ft}^3/\text{min}) / \text{ft}^2) (60\text{min/hr}) (1\text{lb}/7000\text{gr}) = 1.0 \text{ lb/hr} = 24 \text{ lbs/day} \\ = 4.38 \text{ tons/yr}$$

##### **Potential PM emissions before control**

$$PM = 1.0 \text{ lbs/hr} / (1 - .999)$$

$$PM = 1.0 \text{ lbs/hr} / (0.001)$$

$$PM = 1000\text{lbs/hr} = 24000 \text{ lbs/day} = 4380 \text{ tons/yr}$$

##### **Compliance**

Allowable emissions      vs      After control emissions

42.5 lbs of PM/hr

1 lb of PM/hr

in compliance with 326 IAC 6-3

## Appendix F

### PSD Applicability

The OAM has recently discovered new emissions factors for wood firing boilers from a Draft AP-42, dated September, 1999. Do to these new emission factors, the CO emissions from the boilers have been reduced thus, causing a reevaluation for PSD applicability.

The following is Cole Hardwood's source history concerning the boilers emissions and construction dates. As shown below the strike out emissions are from the old emissions which have been replace by the new emissions using the new emission factors from AP-42.

#### PSD applicability for CO and NOx SOURCE HISTORY

Boilers	Year Installed	CO (tons/yr)	Nox (tons/yr)	Determination
<b>Boiler EU01-1,</b> 10.0 MMBtu/hr (wood waste)	1983	<del>90.6</del> <b>21.9</b>	<del>40.0</del> <b>8.8</b>	PSD does not apply
Total for source to determine major/minor source status		<del>90.6</del> <b>21.9</b>	<del>40.0</del> <b>8.8</b>	Minor PSD Source
<b>Diesel fired boiler</b> 4.2 MMBtu/hr	1990	0.7	2.6	PSD does not apply
Total for source to determine major/minor source status		<del>92.6</del> <b>22.6</b>	<del>40.2</del> <b>11.4</b>	Minor PSD Source
<b>Boiler EU01-2</b> 18.4 MMBtu/hr (wood waste)	1991	<del>167.9</del> 40.3	<del>48.8</del> 16.1	PSD does not apply
Total for source to determine major/minor source status		<del>260.5</del> <b>62.9</b>	<del>29.0</del> <b>27.5</b>	<del>Major PSD Source</del> Minor PSD Source
<b>Boiler EU01-3</b> 20.1 MMBtu/hr (wood waste)	1996	<del>193.0</del> 44.0	<del>21.3</del> 17.6	<del>PSD applies,</del> <del>unless take a limit</del> PSD does not apply
Total for source to determine major/minor source status		<b>106.9</b>	<b>45.1</b>	Minor PSD Source

This source is a minor source because the total emissions are less than the major source threshold levels (250 tons/yr) for attainment counties.

## Appendix F

### PSD Applicability

#### PSD applicability for PM

#### SOURCE HISTORY

Boilers	Year Installed	PM (tons/yr)	PM (tons/yr) after control	Determination
<b>Boiler EU01-1,</b> 10.0 MMBtu/hr (wood waste)	1983	19.5	3.9	PSD does not apply
<b>Woodworking Machining Line EU02-1</b>	1983	19.3	0.2	
<b>Low-Pressure Airless Spray Gun EU03-1</b>	1983	0.0	0.0	
<b>Low-Pressure Airless Spray Gun EU03-2</b>	1983	4.2	4.2	
Total for source to determine major/minor source status		43.0	8.3	Minor PSD Source
<b>Diesel fired boiler</b> 4.2 MMBtu/hr	1990	0.3	0.3	PSD does not apply
Total for source to determine major/minor source status		43.3	8.6	Minor PSD Source
<b>Boiler EU01-2</b> 18.4 MMBtu/hr (wood waste)	1991	35.9	7.2	PSD does not apply
<b>Woodworking Machining Line EU02-2</b>	1991	186.1	4.4	
Total for source to determine major/minor source status		265.3	20.2	Minor PSD Source
<b>Boiler EU01-3</b> 20.1 MMBtu/hr (wood waste)	1996	39.3	7.9	PSD does not apply
Total for source to determine major/minor source status		<b>304.6</b>	<b>28.1</b>	Minor PSD Source

This source is a minor source because the after control total emissions are less than the major source threshold levels (250 tons/yr) for attainment counties.

In order to remain a minor source, the control equipment shall be in operation at all times that the facilities are in operation.

**Appendix B: Emissions Calculations**  
**Wood Fired Boiler, EU01-1**  
**Wood Waste**

Page 1 of 4 TSD App B

**Company Name:** Cole Hardwood, Inc.  
**Address, City IN Zip:** 1611 W. Market St., Logansport, IN 46947  
**Title V No.** T017-7522-00028  
**Reviewer:** Mike Swinney

Heat input Capacity MMBtu/hr	Heating Value wood waste (Btu/lb)	Throughput of wood waste (ton/hr)	Control Efficiency
10	6629	0.75	80.0%

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lbs/ton	5.91	5.17	0.32	2.65	1.23	6.63
Potential Emission in lbs/hr	4.5	3.9	0.2	2.0	0.9	5.0
Potential Emission in Tons/yr	19.5	17.1	1.1	8.8	4.1	21.9
Cyclone control tons/yr	3.91	3.42				

**Converting lb/MMBtu to lb/ton**

Pollutant	lb of pollutant/MMBtu of heat input AP-42	higher heating value Btu/ lb of woodwaste	2000 lb woodwaste/ tons of woodwaste	lb of pollutant/ ton woodwaste
PM	0.446	6629	2000	5.91
PM10	0.39	6629	2000	5.17
SO2	0.024	6629	2000	0.32
NOx	0.2	6629	2000	2.65
VOC	0.093	6629	2000	1.23
CO	0.5	6629	2000	6.63

**METHODOLOGY**

Emission Factors are from Draft AP 42, Tables 1.6-1, 1.6-2 and 1.6-3, dated September 1999.

One pound of wood has a heating value of 6629 Btu and wood is assumed to have a 30% moisture content.

Throughput of wood waste = heat input capacity MMBtu/hr \* lb of wood / 6629 Btu \* 1000,000/MM =lb/hr \*ton/2000lbs = tons/hr

Potential emission rate = throughput of wood waste \* emission factor

Control Efficiency = potential emission (ton/yr) x (1-.80)

Conversion lb/MMBtu to lb/ton = lb of pollutant/MMBtu of heat input\*higher heating value Btu/lb wood waste \* 2000 lb woodwaste/ ton woodwaste

**Appendix B: Emissions Calculations****Diesel Fired Boiler****#1 and #2 Fuel Oil**

**Company Name:** Cole Hardwood, Inc.  
**Address, City IN Zip:** 1611 W. Market St., Logansport, IN 46947  
**Title V:** T017-7522-00028  
**Reviewer:** Mike Swinney

Heat Input Capacity

MMBtu/hr

4.2

Potential Throughput

kgals/year

262.8

S = Weight % Sulfur

0.05

	Pollutant				
	PM*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Emission Factor in lb/kgal	2.0	7.1 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.26	0.93	2.63	0.04	0.66

**METHODOLOGY**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix B: Emissions Calculations**  
**Wood Fired Boiler, EU01-2**  
**Wood Waste**

Page 3 of 4 TSD App B

**Company Name:** Cole Hardwood, Inc.  
**Address, City IN Zip:** 1611 W. Market St., Logansport, IN 46947  
**Title V No.** T017-7522-00028  
**Reviewer:** Mike Swinney

Heat input Capacity MMBtu/hr	Heating Value wood waste (Btu/lb)	Throughput of wood waste (ton/hr)	Control Efficiency
18.4	5961	1.54	80.0%

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lbs/ton	5.32	4.65	0.29	2.38	1.11	5.96
Potential Emission in lbs/hr	8.2	7.2	0.4	3.7	1.7	9.2
Potential Emission in Tons/yr	35.9	31.4	1.9	16.1	7.5	40.3
Cyclone control tons/yr	7.19	6.29				

**Converting lb/MMBtu to lb/ton**

Pollutant	lb of pollutant/MMBtu of heat input AP-42	higher heating value Btu/ lb of woodwaste	*2000 lb woodwaste/ tons of woodwaste	lb of pollutant/ ton woodwaste
PM	0.446	5961	2000	5.32
PM10	0.39	5961	2000	4.65
SO2	0.024	5961	2000	0.29
NOx	0.2	5961	2000	2.38
VOC	0.093	5961	2000	1.11
CO	0.5	5961	2000	5.96

**METHODOLOGY**

Emission Factors are from Draft AP 42, Tables 1.6-1, 1.6-2 and 1.6-3, dated September 1999.

One pound of wood has a heating value of 5961 Btu and wood is assumed to have a 30% moisture content.

Throughput of wood waste = heat input capacity MMBtu/hr \* lb of wood /5961 Btu \* 1000,000/MM =lb/hr \*ton/2000lbs = tons/hr

Potential emission rate = throughput of wood waste \* emission factor

Control Efficiency = potential emission (ton/yr) x (1-.80)

Conversion lb/MMBtu to lb/ton = lb of pollutant/MMBtu of heat input\*higher heating value Btu/lb wood waste \* 2000 lb woodwaste/ ton woodwaste

**Appendix B: Emissions Calculations**  
**Wood Fired Boiler, EU01-3**  
**Wood Waste**

Page 4 of 4 TSD App B

**Company Name:** Cole Hardwood, Inc.  
**Address, City IN Zip:** 1611 W. Market St., Logansport, IN 46947  
**Title V No.** T017-7522-00028  
**Reviewer:** Mike Swinney

Heat input Capacity MMBtu/hr	Heating Value wood waste (Btu/lb)	Throughput of wood waste (ton/hr)	Control Efficiency
20.1	6200	1.62	80.0%

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Adjusted Emission Factor in lbs/ton	5.53	4.84	0.30	2.48	1.15	6.20
Potential Emission in lbs/hr	9.0	7.8	0.5	4.0	1.9	10.1
Potential Emission in Tons/yr	39.3	34.3	2.1	17.6	8.2	44.0
Cyclone control tons/yr	7.85	6.87				

**Converting lb/MMBtu to lb/ton**

Pollutant	lb of pollutant/MMBtu of heat input AP-42	higher heating value Btu/ lb of woodwaste	2000 lb woodwaste/ tons of woodwaste	lb of pollutant/ ton woodwaste*
PM	0.446	6200	2000	5.53
PM10	0.39	6200	2000	4.84
SO2	0.024	6200	2000	0.30
NOx	0.2	6200	2000	2.48
VOC	0.093	6200	2000	1.15
CO	0.5	6200	2000	6.20

**METHODOLOGY**

Emission Factors are from Draft AP 42, Tables 1.6-1, 1.6-2 and 1.6-3, dated September 1999.

One pound of wood has a heating value of 6200 Btu and wood is assumed to have a 30% moisture content.

Throughput of wood waste = heat input capacity MMBtu/hr \* lb of wood / 6200 Btu \* 1000,000/MM =lb/hr \*ton/2000lbs = tons/hr

Potential emission rate = throughput of wood waste \* emission factor

Control Efficiency = potential emission (ton/yr) x (1-.80)

Conversion lb/MMBtu to lb/ton = lb of pollutant/MMBtu of heat input\*higher heating value Btu/lb wood waste \* 2000 lb woodwaste/ ton woodwaste